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*Cadila Healthcare Limited*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

TAKEDA PHARMACEUTICAL  
COMPANY LIMITED, TAKEDA  
PHARMACEUTICALS NORTH  
AMERICA, INC., TAKEDA  
PHARMACEUTICALS LLC,  
TAKEDA PHARMACEUTICALS  
AMERICA, INC., and ETHYPHARM,  
S.A.,

Plaintiffs,

v.

ZYDUS PHARMACEUTICALS USA  
INC. and CADILA HEALTHCARE  
LIMITED,

Defendants.

CIVIL ACTION NO:  
3:10-CV-01723-JAP-TJB

Motion Date: November 21, 2011

**Oral Argument Requested**

**NOTICE OF MOTION FOR  
LEAVE TO FILE A REPLY IN  
FURTHER SUPPORT OF MOTION  
FOR RECONSIDERATION**

To: Attached Service List

**PLEASE TAKE NOTICE** that on November 21, 2011, at 9:00 a.m., or as soon thereafter as counsel may be heard, counsel for defendants Zydus Pharmaceuticals, USA, Inc. and Cadila Healthcare, Limited (collectively

“Defendants” or “Zydus”), shall move, through its attorneys Kelley Drye & Warren LLP, before the Hon. Joel A. Pisano, for leave to file a reply in further support of Defendants’ Motion for Reconsideration of the Court’s October 5, 2011 Opinion and Order.

**PLEASE FURTHER TAKE NOTICE** that in support of this motion, Zydus shall rely upon Defendants’ Memorandum In Support Of Defendants’ Motion For Leave to File a Reply, and Zydus’ Proposed Reply In Further Support Of Defendants’ Motion For Reconsideration, attached to the Memorandum in Support of Motion for Leave to File a Reply as Exhibit A, together with the Declaration of Vincent P. Rao in Further Support of Defendants’ Motion for Reconsideration of Claim Construction attached as Exhibit B.

**PLEASE FURTHER TAKE NOTICE** that a proposed form of Order is submitted herewith in accordance with L. Civ. R. 7.1(e).

Dated: November 11, 2011

KELLEY DRYE & WARREN LLP

By: /s/ Vincent P. Rao II  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 11, 2011 I caused to be served a copy of the foregoing Defendants Zydus Pharmaceuticals, USA, Inc. and Cadila Healthcare's Notice of Motion For Leave To File A Reply In Further Support Of Motion For Reconsideration, the Memorandum of Law in Support of the Motion with exhibits, the Declaration of Vincent P. Rao II with exhibits and a Proposed Order on each interested party in this action in accordance with the electronic filing procedures of the United States District Court for the District of New Jersey.

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Dated: November 11, 2011

*s/Vincent P. Rao II*  
Vincent P. Rao II